

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

SAMSUNG ELECTRONICS CO., LTD.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 15-1059-CFC
	)	
IMPERIUM IP HOLDINGS (CAYMAN),	)	
LTD.,	)	
	)	
Defendant.	)	

**STIPULATION**

WHEREAS, on March 2, 2020, the Court entered an order denying defendant Imperium IP Holdings (Cayman), Ltd.’s (“Imperium”) motion to dismiss (D.I. 88);

WHEREAS, Imperium thereafter did not answer the complaint on the date established by Federal Rule of Civil Procedure 12(a)(4)(a);

WHEREAS, plaintiff Samsung Electronics Co., Ltd. (“Samsung”) filed a motion for entry of default (D.I. 90) on March 20, 2020;

WHEREAS, new counsel appeared for Imperium on April 2, 2020 (D.I. 91);

WHEREAS, new counsel for Imperium asked Samsung to withdraw its motion for entry of default and to consent to a new date for Imperium to answer the complaint;

WHEREAS, the parties have reached certain agreements regarding Imperium’s request and scheduling in this action;

NOW, THEREFORE, the parties stipulate and agree, subject to the approval of the Court, as follows:

1. Imperium shall answer the complaint on or before May 1, 2020.
2. The parties shall meet and confer under Federal Rule of Civil Procedure 26(f) and

submit a proposed scheduling order on or before May 8, 2020.

3. Imperium by May 15, 2020 shall provide substantive responses to Samsung's First Set of Interrogatories (Nos. 1-9) and First Set of Requests for Production (Nos. 1-10), both of which were previously served on October 3, 2017.

4. Imperium will not object to discovery on grounds that Imperium has renewed its motion to transfer or that such a motion is pending before the Court, and will fully participate in any such discovery. Imperium may, however, interpose any other objection to discovery permitted by the Federal Rules of Civil Procedure.

5. The parties by April 17, 2020 will agree to a cross-use agreement for all materials served on either party, including discovery (including deposition transcripts) and filings, from the related, completed action in the Eastern District of Texas (*Imperium IP Holdings (Cayman) v. Samsung Electronics Co., Ltd.*, Civil Action No. 4:14-CV-371).

6. Upon entry of this stipulation by the Court, Samsung's motion for entry of default (D.I. 90) is withdrawn without prejudice.

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/s/ John W. Shaw

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*Attorneys for Plaintiff*

Dated: April 10, 2020

SO ORDERED this \_\_\_\_\_ day of April, 2020.

STRADLEY RONON  
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\_\_\_\_\_  
United States District Judge